

UNITED STATES DISTRICT COURT

for the
Southern District of Ohio

In the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)

Case No. **1:22-MJ-00005**

Priority Mail Express parcel label number EJ837616676US, postmarked January
3, 2022, weighing 2 pounds 3.4 ounces, addressed Madison T Bobrow, 17192
Murphy Ave, PO Box #14340, Irvine, CA 92623 with a return address of Bright
Ideas Co, 48 Indiana Ave, Fort Thomas, KY 41075

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

Priority Mail Express parcel label number EJ837616676US

located in the Southern District of Ohio, there is now concealed (identify the person or describe the property to be seized):

Controlled Substances, materials and documents reflecting the distribution of controlled substances through the U.S. Mails, including money and/or monetary instruments paid for controlled substances

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
☒ contraband, fruits of crime, or other items illegally possessed;
☐ property designed for use, intended for use, or used in committing a crime;
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of: Title 21

Code Section	Offense Description
841 (a) (1), 843 (b) & 846	Conspiracy to distribute a controlled substance
	Possession with intent to distribute a controlled substance

The application is based on these facts:

See attached affidavit of U.S. Postal Inspector O'Neill

- ☒ Continued on the attached sheet.
☐ Delayed notice _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

[Handwritten Signature]

Applicant's signature

Karen L. O'Neill, U. S. Postal Inspector

Printed name and title

Sworn to before me and signed in my presence. **via electronic means, specifically Facetime video.**

Date: Jan 5, 2022

[Handwritten Signature]

Judge's signature



City and state: Cincinnati, Ohio

Honorable Stephanie K. Bowman
United States Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF SEARCH WARRANT

I, KAREN O'NEILL, HAVING BEEN DULY SWORN, DEPOSE AND STATE: I am a United States Postal Inspector, having been so employed since March 2003.

1. I am presently assigned to the Cincinnati Field Office, Pittsburgh Division of the Postal Inspection Service with investigative responsibility for Southwest Ohio, Northern Kentucky, and Southeast Indiana. Part of my investigative responsibility involves the use of the United States Mail in the transporting of narcotics and other dangerous controlled substances and financial proceeds relating thereto.

2. Your affiant has become aware that drug traffickers frequently use Express Mail, a business-oriented overnight service offered by the United States Postal Service, to transport narcotics and other dangerous controlled substances, and their proceeds or instrumentalities from the sale of the controlled substances. Your affiant has also become aware that drug traffickers frequently use Priority Mail with delivery confirmation, a 2-3 day service offered by the United States Postal Service. As a result of investigations and successful controlled substance prosecutions where the mail was used, your affiant has learned of certain characteristics indicative of other mail items previously identified as containing narcotics or other dangerous controlled substances, their proceeds or instrumentalities from the sale of the controlled substances. Some of these characteristics include, but are not necessarily limited to or used on every occasion, the mailer using different post offices on the same day to send parcels, false or non-existent return address, addressee is not known to receive mail at the listed delivery or sender address, the package is heavily taped, the package is mailed from a known drug source location, labeling information contains misspellings, unusual odors emanating from the package, and the listed address is located in an area of known or suspected drug activity.

3. U.S. Postal Inspectors are aware that the State of California is a source location for controlled substances that are regularly mailed to the Commonwealth of Kentucky and the proceeds from the sales of controlled substances are frequently returned to California via the U.S. Mail. Based on this information, your affiant routinely reviews parcels and conducts postal database checks for inbound and outbound parcels that exhibit characteristics of parcels suspected of containing controlled substances and/or the proceeds from the sale of controlled substances.

4. On or about January 3, 2022, your affiant was reviewing outbound parcels in a postal database and identified Priority Mail Express parcel label number EJ837616676US (SUBJECT PARCEL) addressed to 17192 Murphy Ave Unit 14340, Irvine, CA 92623. The parcel was mailed from the Newport Post Office, Newport, Kentucky at approximately 11:13 a.m. and had already departed their location for the Postal Processing & Distribution Center (P&DC), Cincinnati, Ohio.
5. Your affiant did a check in Google for the addressee address 17192 Murphy Ave, Irvine, CA 92623. According to Google, a U.S. Post Office is located at the address.
6. Your affiant contacted the Cincinnati P&DC regarding the SUBJECT PARCEL. Your affiant learned the parcel is addressed to Madison T Bobrow, 17192 Murphy Ave, PO Box #14340, Irvine, CA 92623 with a return address of Bright Ideas Co, 48 Indiana Ave, Fort Thomas, KY 41075. Your affiant requested the SUBJECT PARCEL be placed in a secure location for further investigation.
7. Your affiant did a check in CLEAR regarding the return address. CLEAR is a database that is used by law enforcement as a tool to identify person/business and address information. According to CLEAR, the business name "Bright Ideas Co" is not associated with 48 Indiana Ave, Fort Thomas, KY 41075.
8. Your affiant did a check in Google regarding "Bright Ideas Co" and was unable to locate a business with that name in Fort Thomas, Kentucky. Upon further investigation, your affiant found 48 Indiana Ave, Fort Thomas, KY 41075, a single family residence, on multiple realtor sites currently for sale.
9. Your affiant located PO Box #14340, Irvine, CA 92623 in the USPS database related to a seizure of a parcel mailed from Dayton, Ohio in September 2021 addressed to Madison T Bobrow. The parcel was found to contain \$6,600.00 in U.S. currency and was seized by the government.
10. On or about January 4, 2022, your affiant obtained the SUBJECT PARCEL from the Cincinnati P&DC.
11. Your affiant contacted Cincinnati Police Department Specialist Mike Harper to arrange for a narcotic canine to check the SUBJECT PARCEL. Specialist Harper responded to the Loveland Post Office, Loveland, Ohio where the parcel was placed in a controlled area and presented to narcotic canine, "Cairo". "Cairo" alerted positively to the presence or odor of a controlled substance or their proceeds or instrumentalities upon the SUBJECT PARCEL. Your affiant knows that Specialist Harper and narcotic canine "Cairo" train regularly and are certified annually through the Ohio Peace Officer Training Academy.

Your affiant has presented countless parcels to Specialist Harper and canine "Cairo" which has resulted in successful seizures of a quantity of a narcotic or other dangerous controlled substance and their proceeds or instrumentalities therefore your affiant considers them to be reliable. Attached herewith, and made part hereof by reference, is a photocopy of the narcotic canine handler's record of examination.

12. The SUBJECT PARCEL is further identified as follows: a U.S. Postal Service Priority Mail Express cardboard box approximately 12" x 3.5" x 14" in size, weighing 2 pounds 3.4 ounces, bearing label number EJ837616676US, postmarked January 3, 2022; see address information below:

Sender: Bright Ideas Co
48 Indiana Ave
Fort Thomas, KY 41075

Addressee: Madison T Bobrow
17192 Murphy Ave
PO Box #14340
Irvine, CA 92623

13. This information along with the positive alert of narcotic canine "Cairo" is indicative of a drug parcel or its proceeds.

14. Based on the information contained herein, your affiant believes that contained in the SUBJECT PARCEL is a quantity of a narcotic or other dangerous controlled substance, their proceeds or instrumentalities.

15. The SUBJECT PARCEL is being secured at the USPIS Field Office, Cincinnati, Ohio pending further investigation.

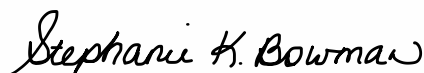
Therefore, a search warrant to open the SUBJECT PARCEL is requested.

Further, your affiant sayeth naught.



Karen O'Neill
Postal Inspector

Subscribed and sworn to and before me this 5th day of January, 2022.
via electronic means, specifically Facetime video.



Honorable Stephanie K. Bowman
United States Magistrate Judge





United States Postal Inspection Service
Pittsburgh Division

OFFICER AFFIDAVIT

I, Mike Harper, am and have been employed by the Cincinnati Police Department since 2001. Among other duties, I am currently the assigned handler of narcotics detection canine "Cairo" which is trained and certified in the detection of the presence or odor of narcotics described as follows:

marijuana, cocaine, methamphetamine and heroin

On 1-4-2022, at the request of Postal Inspector K. O'Neill, I responded to

Cleveland Post Office, Cleveland OH, where "Cairo" did alert to and indicate upon:

[describe item]

PME EJ837616476 US addressed to Madison T. Bobrow
17192 Murphy Ave Po Box # 14340 Irvine CA 92623
return Bright Ideas Co 48 Indiana Ave Fort Thomas KY
41075

Which, based upon my training and experience and that of "Cairo", indicates there is contained within or upon the above described item, the presence or odor of a narcotic or other controlled substance.

[Signature] 1/4/22
(Signature and Date)

[Signature] 1/4/22
(Signature and Date)